



GEORGIA M. PESTANA
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JOHN SCHEMITSCH
Senior Counsel
Phone: (212) 356-2375
Fax: (212) 356-3509
jschemit@law.nyc.gov

April 28, 2022

VIA ECF

Honorable Paul G. Gardephe
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Luis Jaime v. Captain Kirkland et al., 20-CV-4365 (AJN) (DCF)

Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendants Captain Kirkland, Captain Morales, Captain Phillips, and Chief Jennings. Defendants motion for summary judgment is presently due on May 2, 2022. The undersigned is presently out of work sick and will be unable to return to work until next week at the earliest. Defendants accordingly respectfully request a two week extension of time to file their motion for summary judgment, from May 2, 2022 to May 16, 2022, with a corresponding extension of time for plaintiff's opposition to May 30, 2022, and defendants' reply to June 6, 2022. This is the second such request, to which plaintiff consents.

Thank you for your consideration herein.

Respectfully submitted,

/s/
John Schemitsch
Senior Counsel

cc:

VIA ECF

Samuel DePaola, Esq.
Sim & DePaola, LLP
Attorney for Plaintiff

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: May 6, 2022